

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS)	Case No. 6:20-cv-00572-ADA
LICENSING & DEVELOPMENT,)	
)	Case No. 6:20-cv-00580-ADA
<i>Plaintiff,</i>)	
)	Case No. 6:20-cv-00584-ADA
v.)	
)	Case No. 6:20-cv-00585-ADA
GOOGLE LLC,)	
)	JURY TRIAL DEMANDED
<i>Defendant.</i>)	
)	

JOINT STATUS REPORT REGARDING CLAIM NARROWING

The parties write to advise the Court, pursuant to the Court's Order Governing Proceedings and the parties' proposed Amended Scheduling Order (submitted June 7) concerning the results of their "second of two meet and confers to discuss narrowing the number of claims asserted and prior art references at issue to triable limits." Counsel met and conferred by telephone June 14, and have continued to correspond concerning further narrowing by email in the days following.

In the most recent round of discussions, Plaintiff Brazos agreed to drop 12 formerly asserted claims in the 580 Case.

The summary of asserted claims and prior art references is now as follows:

<u>October 2 Trial:</u>		
580 Case	20 asserted claims ¹	10 asserted prior art references
585 Case	6 asserted claims	6 asserted prior art references

<u>November 27 Trial:</u>		
572 Case	1 asserted claim	4 asserted prior art references
584 Case	11 asserted claims	4 asserted prior art references

The parties stand ready to appear should that assist the Court.

Date: June 22, 2023

Respectfully submitted,

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¹ **Plaintiff's statement:** Eighteen of the twenty claims asserted by Plaintiff Brazos in the 580 Case are effectively triple duplications of substantively identical limitations across three claim species (method, computer-program, system).

Defendant's statement: Google disagrees regarding the represented overlap, particularly with respect to invalidity, and does not believe that 26 asserted claims is a reasonable number to be tried in a single trial.

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Attorneys for Defendant Google LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of June, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which served a copy via email to all counsel of record.

/s/ Joseph M. Abraham
Joseph M. Abraham

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(G), counsel for Brazos conferred with counsel for Google regarding the subject of this filing, and the parties are agreed.

/s/ Joseph M. Abraham
Joseph M. Abraham